

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

MAY 14 2018

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS**

JAMES W. McCORMACK, CLERK
By: [Signature] DEP CLERK

MALIK AKBAR'EL

PLAINTIFF

VS.

Case No. 4:18-cv-322-BSM

J. CAMPBELL McLAURIN III

MATTHEW J WEST

CHARLES M BRISCOE

TONJA LAST NAME UNKNOWN

This case assigned to District Judge Miller
and to Magistrate Judge Volpe

DEFENDANTS

**MOTION TO RETURN PROPERTY DO TO 4TH, 5TH.6TH, AMENDMENT
VIOLATION**

Comes Now, Pro Se On April 16, 2018, Plaintiff went to the Arkansas Securities Department to meet with Defendant, J. Campbell McLaurin III, after getting a letter in the mail, saying that he would like to talk with me and go over some of my files. On April 12, 2018, Defendant McLaurin, call Plaintiff Akbar'El, to make sure Plaintiff would be at the meeting after talking with Defendant, and telling him that Plaintiff was in the hospital, and if I was released I would be there to meet with him.

On April 16, 2018, Plaintiff, went to the Arkansas Securities Department in Good Faith, thinking to meet with Mr, McLaurin III, to talk about the files. After going to the conference room to meet with Defendant McLaurin, Defendant McLaurin III, greeted me, and walk out of the conference room. Two minutes later Matthew J West, and Tonja, last name unknown, came into the conference, and told me they where from the U.S. Department of Justice Federal Bureau of Investigation.

Defendant, McLaurin III, violated my 4th amendment right. The 4th amendment states (The right of the people to be secure in their persons) On law enforcement can us trickery or deception to get a cause of action. Defendant McLaurin III, and I, has a agreement to meet not the FBI, Defendant, fail to comply with a rule or formal agreement that we had.

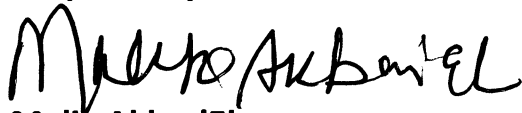
On April 16, 2018, I met with the FBI against my will afraid of what may happen I talk with them, because I did not want them to fill like I had anything to hide. I was trying to explain to them that they cannot look at a bank statement and tell how the business was ran. We talk about 30 minutes then they walk out of the conference room I was thinking the meeting was over, then they walk back in the conference room and begin screaming and yelling at me calling me a liar saying I stole money from people in the company. Then I told the FBI that I would like to talk with a Lawyer I stood up to walk out of the conference room then Mr. Charles M. Briscoe, walk in said he was from Social Security Administration,he states that I had commit a crime against Social Security again I said I need a Lawyer as I was standing Mr. Briscoe, stated you need to help yourself I stated that I haven't done anything wrong he stated that you run a business and did not tell Social Security I told him that I never receive payment from the business. Then I said again I need a Lawyer as I turn around to walk out of the conference room Mr. West, and Ms. Tonja, said let us see your files I said ok I have nothing to hide meet me at my office. (Violation of 6th Amendment, Right to Counsel was DENY)

On April 18, 2018, Defendants, Charles M Briscoe, Matthew J West, and Tonja, last name unknown, went to the office at 7101 W. 12th Street in Little Rock, Ar. 72204. Defendants, went in the office without me been there, the landlord of the building let the Defendants in my office Defendants, stated to me that they had removed files from one office to the hallway. I ask the Defendants to move anything they need a warrant, they stated that they did not need because it was in plain view, I stated the plain view rule did not apply because they was in my office illegally because I did not let them in. Then I ask for a Lawyer again, then Mr. Briscoe, told me a lawyer would not do me any good that they are still taking all of my files. Then Mr. Briscoe, ask me to look at my cell phone after looking at my cell phone he took it. I came in with a computer so the I could show the Defendants how the company was run so I

could show them the hand files with the computer files then the Defendants took my computer. I said to the Defendants you all are taking my things without a warrant you came into my office by a third party. I said you are in violation of my 5th amendment right which is call the due process of the law. I also stated to the Defendants that you will not let me talk to a lawyer and this is not right and it don't matter what you think of me this is not right and you all are in violation of my rights. Then they give me a receipt for my cell phone and for my computer, but that they are taking all of my computers in the office, all the files in the office that they were taking everything in the office. (see exhibit A, receipt). Then Defendant West, took the key to my car I ask him why was he taking my car he stated that my car was use for business I stated that that was my personal car it was never use for business only the cars that was in the name of the company was for business my private property was taking and the 5th amendment states that my private property can not be taking without the due process of the law.

THEREFORE: Plaintiff ask this Honorable court and this Honorable Judge, that this investigation be Dismiss and all property be return back to the plaintiff due to his 4th, 5th, and 6th Amendment been violated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Malik Akbar'El', written in a cursive style.

Malik Akbar'El,

Malik Akbar'El

1821 Simpson St.

Little Rock, Ar. 72204

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
Receipt for Property Received/Returned/Released/Seized

File # _____

On (date) 4-16-2018

item(s) listed below were:

- ☒ Received From
☐ Returned To
☐ Released To
☐ Seized

(Name) Malik Akbar'el(Street Address) 1821 Simpson St.(City) Little Rock, ARDescription of Item(s): (1) Android cellphone, IMEI: 3544 4108 0627 6889
phone # 347-741-2835 (2) Dell laptop, s/n: 2JKWF51-

Received By: _____

(Signature)

Received From: _____

(Signature)